

EXHIBIT 13

In the Matter Of:
Fair Fight vs Raffensperger

30(b)(6) Lauren Groh-Wargo - Confidential

October 30, 2019



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SUITE 265
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1 harm.

2 And so you'll see -- you know, I'm sure
3 you've seen from our -- you know, some of the
4 public work we've done, some of the documents we've
5 provided, we've also been able to do some work on
6 progressive issues, you know, on healthcare, on the
7 abortion bill. But you know, there would be much
8 more we would do if we weren't having to divert
9 resources.

10 And similarly, as we think about going
11 forward into this fall and next year, you know,
12 we're thinking about what are all the things we
13 would want to do just generally for our mission but
14 knowing that, depending on how this lawsuit
15 transpires, and depending on how the State behaves,
16 that we're going to have to, you know, divert
17 resources to make sure people know, for example,
18 that if the State is purging 300,000 folks off the
19 rolls, are we going to go contact those folks to
20 make sure they check their voter registration
21 status, right, like, what other things are we doing
22 to make sure that that purge is done in a way
23 that's lawful and to make sure that voters know.

24 So those are the sorts of things we're
25 looking at in terms of future diversion of

1 Access Institute; is that correct?

2 A. Yes.

3 Q. And if you'll look down with me, number
4 four, the following amendments were made to the
5 articles, the name was changed to Fair Fight
6 Action; correct?

7 A. Yes.

8 Q. And on the last page, it appears that you
9 signed these Articles of Amendment on November
10 21st, 2018.

11 A. Yes.

12 Q. The other amendment on the second page
13 was to strike language relating to participation in
14 political campaigns. Do you see that?

15 A. I do.

16 Q. And you'd agree with me that Article II,
17 the purpose section of Voter Access Institute, is
18 not referenced in these amendments and was not
19 changed; correct?

20 A. Correct.

21 Q. And so would you agree that the purpose
22 of Voter Access Institute and the purpose of the
23 organization as it now is named Fair Fight Action
24 are the same?

25 A. Yes.

1 intended.

2 THE WITNESS: I did not write this
3 for her, so I cannot tell you that.

4 BY MR. TYSON:

5 Q. Okay. If you could turn to Page 1490.
6 Ms. Abrams is responding to a question from
7 Mr. Johnson of Georgia, and she describes Fair
8 Fight as "a non-partisan voting rights advocacy
9 organization" and "I am proud to serve as founder
10 and chair" and "the C.E.O. is Lauren Groh-Wargo."

11 Do you see that?

12 A. Yes.

13 Q. And that's describing Fair Fight Action;
14 correct?

15 A. That should be Fair Fight Action.

16 Q. And Ms. Abrams explains that one of
17 the -- what we attempt to do is "lift up the issue
18 of fair voting, making certain that there is" an
19 "equitable, efficient and truly equal access to the
20 right to vote in the state of Georgia."

21 Is that part of the overall purpose of
22 Fair Fight Action as Ms. Abrams describes it?

23 A. So as we've talked about, the core
24 purpose of voter engagement, voter access, voter --
25 the voter turn-out activities has remained

1 How I would describe it as a layperson is
2 the State of Georgia has taken deliberate actions
3 and inactions over many years to erect barriers
4 targeted at voters of color, naturalized citizens,
5 and sort of a death by a million cuts in terms of
6 how policies and laws have actually been
7 implemented.

8 Inactions like lack of training, lack of
9 resources, lack of enforcing the law and the
10 constitution, all of those add up together to be
11 reminiscent of the Jim Crow era in terms of intent
12 and practical outcomes.

13 Q. And in Paragraph 44 there's -- on Page
14 22, it says that:

15 "Voters faced an unconstitutional
16 statute who's arbitrary enforcement
17 purged thousands of voters from"
18 registering to vote.

19 A. Where is -- I'm sorry. Where are you?

20 Q. Paragraph 44. It's the -- right after
21 the colon, "time-tested voter suppression
22 tactics..."

23 A. Okay.

24 Q. Yeah. Are you with me?

25 A. I think so, yeah.

1 press reports, expert opinions, literature, the
2 Secretary of State's own data.

3 There's all kinds of inputs that shows
4 that pattern here and that this was an
5 intentional -- that there were intentional actions
6 and inactions taken.

7 Q. And what were the intentional actions
8 that were taken?

9 A. How "exact match" was implemented.
10 There's a long series in our complaint. The lack
11 of training and resources on -- the lack of
12 oversight and training on absentee ballots, on
13 underuse, overuse and misuse of provisional
14 ballots, on the large-scale "use it or lose it"
15 purges on the implementation of "exact match" that
16 the D.O.J. sent to the state of Georgia during the
17 Obama era that, no, State of Georgia, you cannot
18 implement "exact match" in this way, it will
19 disproportionately impact voters of color,
20 naturalized citizens.

21 And then after Shelby, the State went
22 ahead and did it knowing full well that, as written
23 by the previous D.O.J., that that was a
24 discriminatory -- that was going to have a
25 discriminatory impact.

1 I mean, we can go -- just going through
2 the claims at the beginning in terms of inaccurate
3 voter rolls, so many instances of declarants
4 showing up, husbands and wives, one person on the
5 roll, one person not, and somebody sent across a
6 county, were given a provisional ballot, were
7 having to choose whether or not they wanted to take
8 the one provisional ballot that was left, all of
9 these examples, so laid out in our table of
10 contents on -- early on in the complaint and
11 outlined in the complaint, all of those different
12 problems that we've seen in Georgia.

13 Q. Are there any examples or any situations
14 that Fair Fight Action is aware of that it claims
15 Georgia policy uses to target communities of color
16 that are not included in the amended complaint?

17 A. That is a very big question, sir. That
18 the State of Georgia uses beyond voting?

19 Q. My question is related to specifically
20 Paragraph 44, the allegation that Georgia voters --
21 that Georgia policies targeted communities of
22 color.

23 A. So are you saying is the complaint
24 comprehensive or are there other things not in this
25 complaint that Fair Fight Action thinks is

1 some point Secretary of State did, in terms of this
2 is a way to save money, close these precincts,
3 et cetera.

4 But they certainly in the chief elections
5 role were advising and a part of the counties'
6 decision and how they went forth to close
7 precincts. And as a factual matter, those
8 locations were disproportionately in
9 African-American communities around the state.

10 Q. Going to Paragraph 60, there's a
11 reference to the Secretary of State taking an
12 active role and refers to the Randolph County
13 polling place closures.

14 Does Fair Fight Action have any knowledge
15 of any county outside of Randolph County that the
16 Secretary of State allegedly encouraged closing of
17 polling locations?

18 A. I believe there was -- there has been
19 information put out by the Secretary of State
20 encouraging counties that -- to that Shelby is
21 over, they no longer have to pre-clear it, you can
22 go ahead and close locations, et cetera.

23 So that's a general missive or message to
24 elections officials that they did that.

25 Q. And beyond that general message in the

1 Randolph County scenario, Fair Fight Action does
2 not have any other knowledge of the Secretary
3 encouraging the closure of polling locations?

4 A. I'm not sure. Not that I know offhand.

5 MS. LAWRENCE-HARDY: And I just want
6 to note again, we're getting a little far
7 afield from the topic.

8 MR. TYSON: Uh-huh.

9 MS. LAWRENCE-HARDY: So she can
10 certainly talk to the laws as opposed to
11 specific allegations.

12 MR. TYSON: Uh-huh. I'm trying to
13 get to the facts --

14 MS. LAWRENCE-HARDY: As a layperson.

15 MR. TYSON: -- underlying the
16 complaint. That's what we're trying --
17 I'm trying to get to. So.

18 MS. LAWRENCE-HARDY: Oh, but that's
19 not really the topic. It's not the facts
20 underlying. That's why I just went back
21 to read it again. That's not how the
22 topic is defined.

23 MR. TYSON: I see that. The good
24 news is I'm pretty much done with this
25 section --